

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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	:	
In re:	:	Chapter 11
	:	
LIMETREE BAY SERVICES, LLC, <i>et al.</i> ¹ ,	:	Case No. 21-32351 (DRJ)
	:	
Debtors.	:	(Jointly Administered)
	:	
	X	

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS' WITNESS AND EXHIBIT
LIST AND RESERVATION OF RIGHTS**

The Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby submits the following *Witness and Exhibit List* (the “Witness and Exhibit List”) with respect to the hearing scheduled on April 5, 2022 at 1:00 pm (CT) (the “Hearing”),² in the above-styled, jointly administered bankruptcy cases (the “Cases”) before the Honorable David R. Jones, Chief United States Bankruptcy Judge, Courtroom 400, 515 Rusk, Houston, Texas 77002.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Limetree Bay Services, LLC (1866); Limetree Bay Refining Holdings, LLC (1776); Limetree Bay Refining Holdings II, LLC (1815); Limetree Bay Refining, LLC (8671); Limetree Bay Refining Operating, LLC (9067); Limetree Bay Refining Marketing, LLC (9222). The Debtors’ mailing address is Limetree Bay Services, LLC, 11100 Brittmoore Park Drive, Houston, TX 77041.

² The Hearing will be conducted with respect to (A) the *Official Committee of Unsecured Creditors’ Emergency Motion for Entry of an Order Dismissing the Chapter 11 Cases and Granting Related Relief* [Docket No. 1212] (the “Motion to Dismiss”); (B) the *Debtors’ Emergency Motion for Entry of an Order (I) Conditionally Approving the Adequacy of the Disclosure Statement; (II) Approving the Solicitation and Notice Procedures with Respect to Confirmation of the Plan, (III) Approving the Form of Various Ballots and Notices in Connection therewith; and (IV) Approving the Scheduling of Certain Dates in Connection with Confirmation of the Plan* [Docket No. 1213] (the “Conditional Approval Motion”); and (C) the Court’s *sua sponte* Order to Show Cause why these Cases should not be converted to cases under Chapter 7 of the Bankruptcy Code [Docket No. 1237] .

WITNESS LIST

The Committee may call the following witnesses:

1. Any witness listed, offered, or called by any other party.
2. Any witness required for rebuttal or impeachment.

EXHIBIT LIST

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
1.	Any exhibits listed, designated, or offered by any other party.				
2.	Any exhibits necessary for rebuttal.				
3.	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases and related adversary proceedings				

As set forth in that certain *Debtors' Response to Sua Sponte Order to Show Cause Re: Conversion of Chapter 11 Cases to Case Under Chapter 7 of the Bankruptcy Code* [Docket No. 1249], the Committee, the Debtors, and other parties in interest have reached a resolution in principal with respect to (i) the Motion to Dismiss and (ii) the Committee's concerns and objection to the *Combined Disclosure Statement and Chapter 11 Plan of Liquidation of Limetree Bay Services, LLC and Affiliated Debtors* [Docket No. 1204] (the "Plan"). The resolution of the Motion to Dismiss and of the Committee's objections to the Plan are expressly subject to final, definitive documentation. The Committee reserves all rights to modify, amend or supplement this Witness and Exhibit List at any time, including if a consensual resolution of the Motion to Dismiss and Plan cannot be documented prior to the Hearing. Moreover, should a fully documented and consensual resolution regarding the Plan and Motion to Dismiss not occur prior to the Hearing, the Committee reserves all rights to seek a continuance of the Hearing.

The Committee further reserves the right to ask the Court to take judicial notice of pleadings, transcripts and/or documents filed in or in connection with these Cases, to offer rebuttal

exhibits, and to supplement or amend this Witness and Exhibit List at any time prior to the Hearing. Designation of any exhibit above does not waive any objections the Committee may have to any exhibit listed on any other party's exhibit list.

Dated: April 4, 2022

Respectfully submitted,

/s/ Michael D. Warner

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Counsel for the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of April, 2022, a true and correct copy of the above and foregoing has been served on all parties that are registered to receive electronic transmission through this Court's CM/ECF filing system in these cases.

/s/ Michael D. Warner

Michael D. Warner